

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE: WORLD TRADE CENTER LOWER
MANHATTAN DISASTER SITE LITIGATION 21 MC 102 (AKH)
IN RE: COMBINED WORLD TRADE CENTER
LOWER MANHATTAN DISASTER SITE
LITIGATION (straddler plaintiffs) 21 MC 103 (AKH)
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NOTICE OF MOTION

PLEASE TAKE NOTICE THAT upon the Declaration of Richard E. Leff dated May 20, 2013 and exhibits annexed thereto will hereby move this Court to dismiss with prejudice certain Plaintiffs' claims for violations of established discovery rules and procedures pursuant to Rule 37 of the Federal Rules of Civil Procedure.

Dated: New York, New York
May 20, 2013

Respectfully submitted,


Richard E. Leff (RL-2123)
McGIVNEY & KLUGER, P.C.
80 Broad Street, 23rd Floor
New York, New York 10004
(212) 509-3456